

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X 08 CIV 2374  
ROBERT THOMAS and DONNA THOMAS,

Plaintiffs,  
-against-

**INTERROGATORIES**

ARSENITY S. SERGEYCHIK and POLONEZ  
PARCEL SERVICE, INC.

Defendants  
-----X

Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and Local Rule 33.3, defendants, ARSENITY S. SERGEYCHIK and POLONEZ PARCEL SERVICE, INC., hereby requests that plaintiff serve upon the undersigned attorneys sworn answers to the interrogatories set forth below within thirty (30) days of service hereof:

1. The names and addresses of witnesses with knowledge and/or information relevant to the subject matter of this action.
2. State the manner of computation of each category of damage alleged.
3. The existence, custodian, location and general description of relevant documents and other physical evidence, or evidence of a similar nature.
4. With respect to any injuries alleged suffered by each individual plaintiff, state:
  - (a) the extent and nature of any disability, including those alleged to be permanent and those alleged to be aggravated.
  - (b) describe in detail the location of any pain suffered, and the duration and intensity of such pain.
  - (c) Whether or not you suffered any restraint of your normal activities due to the injuries allegedly suffered, and describe in detail the nature of such restraint, and the dates you suffered the pain.

5. Have you sustained any additional financial loss as a result of the incident complained of, other than those covered by preceding interrogatories: If so, state:

- (a) the nature and amount of such losses.
- (b) the date thereof.
- (c) the name and address of any persons to whom any money so claimed as an additional loss was paid.

**PLEASE TAKE FURTHER NOTICE**, that this is a continuing demand and that defendant demands compliance with this demand throughout the course of this lawsuit as new or additional information is acquired by opposing parties and/or their counsel.

Dated: White Plains, New York  
May 21, 2008

Yours, etc.,  
LAW OFFICE OF THOMAS K. MOORE

By:   
ROULA THEOFANIS (RT-3240)

Attorney for Defendants  
ARSENITY S. SERGEYCHICK and  
POLONEZ PARCEL SERVICE INC.  
701 Westchester Avenue, Suite 101W  
White Plains, New York 10604  
(914) 285-8500

To: BANK, SHEER, SEYMOUR & HASHMALL  
Attorney for Plaintiffs  
399 Knollwood Road-Suite 220  
White Plains, New York 10603  
(914) 761-9111

AFFIDAVIT OF SERVICE BY MAIL

STATE OF NEW YORK  
COUNTY OF WESTCHESTER

NANCY GUERRA, being duly sworn, deposes and says that deponent is a clerk in the LAW OFFICE OF THOMAS K. MOORE, attorneys for one of the parties herein: is over 18 years of age; is not a party to the action. That deponent served the within

**VERIFIED ANSWER, INTERROGATORIES, DEMAND TO FURNISH SPECIFIED  
INFORMATION AND NOTICE TO TAKE DEPOSITION**

27<sup>th</sup> day of May, 2008 upon the below named attorney(s) for the listed parties, by depositing a true copy of the same securely enclosed in a postpaid wrapper in the Letter Box maintained and exclusively controlled by the United States Postal Service at 701 Westchester Avenue, Suite 101W, White Plains, New York 10604; directed to the said attorney(s) at the address indicated below; that being the address within the state designated by said attorney(s) for that purpose, or the place where said attorney(s) for that purpose, or the place where said attorney(s) then kept an office, between which places there then was and now is a regular communication by mail as follows:

BANK, SHEER, SEYMOUR & HASHMALL  
Attorney for Plaintiffs  
399 Knollwood Road-Suite 220  
White Plains, New York 10603

  
NANCY GUERRA

Sworn to before me this date  
27<sup>th</sup> day of May, 2008

  
NOTARY PUBLIC

ROULA THEOFANIS  
Notary Public, State of New York  
No. 02TH4886849  
Qualified in Westchester County  
Commission Expires 02/17/20 \_\_\_\_